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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

September 19, 2002

SR-6J

Alan Faust, Environmental Health & Safety
Solutia, Inc.
W.G. Krummrich Plant
500 Monsanto Avenue
Sauget, IL 62206-1198

RE: Comments on Mitigation Plan for Sauget Area 1
Sauget and Cahokia, Illinois


Dear Mr. Faust:

A review of Solutia's July 31, 2002, Response to Comments on the Dead Creek Mitigation Plan for the Sauget Area 1 Site has been conducted by the U.S. Environmental Protection Agency (U.S. EPA) as well as the U.S. Army Corps of Engineers. As of the date of this letter, no comments have been received on your response from the Illinois Environmental Protection Agency, U.S. Fish and Wildlife Service or Illinois Department of Natural Resources.

In general, U.S. EPA believes most of the comments have adequately been addressed by your responses. The only exception is with Comment 14, Page 4-2, Borrow Pit Lake (BPL) Investigation Plan, Number of Samples. This comment addressed the need for sediment sampling in the Borrow Pit Lake upstream of the confluence with Dead Creek. After our review of your response to Comment 14, U.S. EPA believes the data shows that there are elevated concentrations in the backwater area and that overall the data is inconclusive regarding whether industry-specific constituents were deposited in the backwater portions of the BPL. Therefore, sediment samples must be collected from the area of the BPL upstream of the confluence with Dead Creek. As previously mentioned, sample spacing in this area could be increased to approximately 300 feet compared to the 200 foot spacing planned for the area downstream of the confluence with Dead Creek. Please re-submit the revised Mitigation Plan on or before October 4, 2002.

If you have any questions regarding the attached comments, please do not hesitate to contact me at 312/886-4592.

Sincerely,


Mike Ribordy
Remedial Project Manager
Superfund Division

cc: Thomas Martin, USEPA
Tim Gouger, USACE
Sandra Bron, Illinois EPA
Kevin de la Bruere, USFWS
Mike Henry, IDNR
Will Bereswill, Anheuser-Busch
Daniel Goodwin, Secor International

bcc: Record Center

